

# EXHIBIT 1

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**From:** Lerner, Jeffrey  
**Sent:** Friday, April 2, 2021 2:26 PM  
**To:** Reza Mirzaie; Cho, Daniel  
**Cc:** Philip Wang; Melissa Smith; Travis Underwood; tom@gillamsmithlaw.com; Samsung-Solas; opp.solas.samsung@raklaw.com; James Tsuei; solas\_samsung\_trial@raklaw.com; Neil Rubin; Steve Udick; Adam Hoffman; Claire Henry; Andrea Fair; rak\_solas@raklaw.com  
**Subject:** RE: Solas v. Samsung (EDTX) - Following up on the Court's Conference Call

Reza,

On the status conference call yesterday, Solas indicated that it would not be filing any post-trial motions of its own. We trust that remains the case, but if it has changed please let us know.

Regarding your proposal to expedite post-trial briefing and set earlier deadlines than provided by Rules 50(b) and 59, what is the reason that Solas believes shortening the deadlines for post-trial motions is needed in this case? In addition, can you provide any authority that the Court may shorten the deadlines for Rule 50(b) and Rule 59 motions? We are not aware of the Court having done so before, but would be interested in seeing any authority that you have for this as we evaluate your proposal.

As we discuss your proposal with our clients, would Solas agree not to seek reconsideration of any final written decisions by the PTAB if there were an agreement along the lines you proposed below to expedite post-trial briefing in the district court litigation?

Regards,  
Jeff

**Jeffrey Lerner**

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**From:** Reza Mirzaie <rmirzaie@raklaw.com>  
**Sent:** Thursday, April 01, 2021 8:53 PM  
**To:** Cho, Daniel <DWCho@cov.com>  
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**Subject:** Solas v. Samsung (EDTX) - Following up on the Court's Conference Call

**[EXTERNAL]**

Hello,

We'd like to follow up on the issues discussed during today's conference call with the Court.

As discussed during that call, Solas would like to propose a slightly expedited briefing schedule for the post-trial motions. Our proposal is outlined below. If Samsung is agreeable to this schedule, we can agree to not file any post-trial motion, including any motion for fees and any motion pertaining to the jury's finding that the asserted '450 claims are invalid.

- **opening briefs by Samsung**
  - Due April 15 (note: would be only about 3 business days before the deadline based on the current schedule)
- **oppositions by Solas**
  - Due April 19
- **any reply by Samsung**
  - Due April 23 (note: this would be only about 3 calendar days before the deadline based on the current schedule)
- **any sur-reply by Solas**
  - Due April 26

Please let us know, by tomorrow afternoon, if Samsung can agree to this schedule. We are free to discuss this over the phone any time tomorrow. Per the conference call today, we plan to file a short document with the Court tomorrow evening, setting forth this request.

Thanks,  
Reza

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